

**REMARKS**

Reconsideration of the present application is respectfully requested. Claims 1-22 are currently pending.

**Rejections based on 35 U.S.C. § 102**

Claims 1, 3-4, 7-8, and 10-11 stand rejected under 35 U.S.C. §102(e) as being anticipated by Saunders, U.S. Patent No. 5,946,499 ("Saunders"). Applicants respectfully traverse this rejection because Saunders does not teach an interface that permits an application "to expose [a] document as an abstraction" as required by independent claims 1 and 7.

Saunders discloses techniques for supporting textual services and inputs. One of these disclosed techniques allows a selected portion of a document to be edited by a text service. The text service first requests a selected portion of text, and then an application communicates data for the specified portion to the text service. To exchange such data, a text object is used. "The application program preferably creates the text object with the text itself, the encoding of the text, and the language/region of the text." Saunders, col. 6, ll. 52-54. The text object simply contains the text and accompanying data as utilized by the application. The text service edits this data and inserts the updated region back into the document. The text service can only interact with the portion of the document it receives from the application, and, in order to insert the updated text, the text service must know how to manipulate the passed text in a manner consistent with the application's editor. Accordingly, the text services disclosed in Saunders cannot be utilized with a variety of different applications.

In contrast, independent claims 1 and 7 require an interface that permits an application "to expose [a] document as an abstraction." Saunders does not teach exposing a document as an

abstraction. Sanders only exposes textual data as it is utilized by the application; nowhere does Sanders disclose expressing a document with abstract elements or with any format different than the data as utilized by the application. Accordingly, Applicants submit that independent claims 1 and 7 are in condition for allowance. Applicants submit that dependent claims 3-4, which depend from claim 1, are in condition for allowance for at least the same reasons discussed above with respect to claim 1. Furthermore, Applicants submit that dependent claims 7-8 and 10-11, which depend from claim 7, are in condition for allowance for at least the same reasons discussed above with respect to claim 7.

### **Rejections based on 35 U.S.C. § 103**

Claims 2, 9, and 14-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung et al., U.S. Patent No. 5,511,193 ("Tung"). Claims 5-6, 12-13, and 20-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington et al., U.S. Patent No. 5,524,193 ("Covington"). Claims 18 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung, and further in view of Covington. Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington, and further in view of Tung.

### **Claims 2, 9, and 14-17**

Claims 2, 9, and 14-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung. Applicants respectfully traverse this rejection because neither Saunders nor Tung, alone or in combination, teach or suggest each and every limitation of the claimed invention as recited in claim 2, claim 9, or independent claim 14.

As discussed previously, Saunders teaches a text service manger that may receive a text object from an application. The text object simply contains the text and accompanying data as utilized by the application. The text service edits this data and inserts the updated region back into the document. The text service may also perform position operations with respect to the text within the object. Saunders, col. 7, ll. 18-33. "The position to offset operation preferably allows a text service to map a device dependent global position to an offset within the text." Hence, the position operations in Saunders are performed only by the text service and not by the application.

In contrast, claims 2, 9 and 14 each recite permitting an application "to expose [a] document as an abstraction" in "which the abstraction of the document appears as an array." Saunders does not teach permitting an application to expose an abstraction in which the document appears as an array.

Tung also fails to disclose this limitation, either individually or in combination with Saunders. Tung teaches a text services manager. The manager determines whether the application uses a floating input window as opposed to an in line input. This determination is made by using a "TSM document" which communicates information between the manager and an application. The applications in Tung do not "expose [a] document as an abstraction."

Hence neither Saunders nor Tung, alone or in combination, teach the claimed invention as recited in claims 2, 9, 14. While the combination of these references may teach utilizing a text service to provide position operations with respect to a segment of text, this combination does not show permitting an application "to expose [a] document as an abstraction" in "which the abstraction of the document appears as an array" as set forth in claims 2, 9, and 14. Accordingly Applicants submit that claims 2, 9, and 14 are in condition for allowance. Furthermore,

Applicants submit that dependent claims 15-17, which depend from independent claim 14, are in condition for allowance for at least the same reasons discussed above with respect to claim 14.

#### Claims 20-21

Claims 20-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington. Applicants respectfully traverse this rejection because neither Saunders nor Covington, alone or in combination, teach or suggest each and every limitation of the claimed invention as recited in independent claim 20.

Saunders has been discussed previously and does not teach permitting a handler for an input device “to access an abstraction of a document of mostly text of an application” as required by independent claim 20. Covington also fails to teach this limitation, and, according, Applicants submit that independent claim 20 is in condition for allowance. Furthermore, Applicants submit that dependent claim 21, which depends from claim 20, is in condition for allowance for at least the same reasons discussed above with respect to claim 20.

#### Dependent Claims 5-6 and 12-13

Claims 5-6 and 12-13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington. Saunders and Covington have been discussed above. Applicants respectfully traverse the rejection because the proposed combination of Saunders and Covington fails to disclose each and every limitation of the claimed invention.

Claims 5 and 6 depend from independent claim 1, while claims 12 and 13 depend from independent claim 7. As discussed above, claims 1 and 7 are patentable over Saunders. Covington also fails to disclose the invention of claim 1 and claim 7, either individually or in

combination with Saunders. Claims 5 and 6 include all of the limitations of claim 1 and are also patentable over Saunders and Covington, taken individually or in combination with one another, for at least the reasons stated above. Claims 12 and 13 include all of the limitations of claim 7 and are also patentable over Saunders and Covington, taken individually or in combination with one another, for at least the reasons stated above.

#### Dependent Claims 18 and 19

Claims 18 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung, and further in view of Covington. Saunders, Tung, and Covington have been discussed above. Applicants respectfully traverse the rejection because the proposed combination of Saunders, Tung, and Covington fails to disclose each and every limitation of the claimed invention.

Claims 18 and 19 depend from independent claim 14. As discussed above, claim 14 is patentable over Saunders and Tung. Covington also fails to disclose the invention of claim 14, either individually or in combination with Saunders and Tung. Claims 18 and 19 include all of the limitations of claim 14 and are also patentable over Saunders, Tung, and Covington, taken individually or in combination with one another, for at least the reasons stated above.

#### Dependent Claim 22

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington, and further in view of Tung. Saunders, Covington and Tung have been discussed above. Applicants respectfully traverse the rejection because the proposed

combination of Saunders, Covington, and Tung fails to disclose each and every limitation of the claimed invention.

Claim 22 depends from independent claim 20. As discussed above, claim 20 is patentable over Saunders and Covington. Tung also fails to disclose the invention of claim 20, either individually or in combination with Saunders and Covington. Claim 22 includes all of the limitations of claim 20 and is also patentable over Saunders, Covington and Tung, taken individually or in combination with one another, for at least the reasons stated above.

**Conclusion**

For the reasons stated above, claims 1-22 are in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and allowance of claims 1-22. If any issues remain which would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott S", written in a cursive style.

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